

REMARKS

Claims 1-42 were examined on their merits. Claims 1, 13 and 41 have been amended. Claim 2 has been cancelled. Claim 1 and claims 3-42 are all the claims currently pending in the present application. Reconsideration of the outstanding rejections in the present application is also respectfully requested based on the following remarks.

Formal Matters

1. Applicants concurrently file herewith a Request for Continued Examination.
2. Applicants note with appreciation the indication on page 5 of the Office Action that claims 8, 9, 18, 19 and 30 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants respectfully request that the Examiner hold the rewriting of claims 8, 9, 18, 19 and 30 in abeyance until the rejection of the parent claims have been reconsidered.

2. Applicants hereby request a two-month extension of time in the amount of two months in order to maintain the pendency of this application. Please charge the undersigned's Deposit Account No. 50-2613 (Order No. 45098.00011.UTL1.P1068) in the amount of \$ 450.00.

Art Rejections

1. Claims 1-7, 10-17, 20-29, 31, 32, and 40-42 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Roseman, U.S. Patent No. 6,608,636 ("Roseman"). Claims 1, 13, 41 and 42 are independent claims. Applicants respectfully traverse this rejection for at least the reasons stated below.

To be an "anticipation" rejection under 35 U.S.C. § 102, the reference must teach every element and recitation of the Applicants' claims. Rejections under 35 U.S.C. § 102 are proper only when the claimed subject matter is identically disclosed or described in the prior art. Thus, the reference must clearly and unequivocally disclose every element and recitation of the claimed invention.

Independent Claim 1

Roseman is directed towards a multimedia conferencing system *See, e.g.*, Roseman Abstract. More specifically, Roseman describes a conferencing system in which participants utilize computers and audio and video communication systems to communicate collaboratively over a computer network. *See, e.g.*, *id.* column 1, lines 34-63. The user interface in Roseman creates a virtual conference table. *See, e.g.*, *id.* column 2, lines 38-60. In mimicking a conference table, the Roseman user interface displays all of the attendees of the conference, and all of the documents displayed on the table. *See, e.g.*, *id.* FIG. 9. Finally, a pointer is used to manipulate documents which are displayed on the conference table. *See, e.g.*, *id.* FIG. 10.

The Examiner asserts that Roseman discloses a multimedia collaboration system configured so that presentation control of the session is exchanged freely between participants. *See* Office Action page 2. While Applicants respectfully disagree with this assertion, Applicants have amended claim 1 to more particularly describe the subject matter sought to be protected. Applicants submit that Roseman fails to disclose at least the following claim limitation recited in newly amended independent claim 1:

“all participants in a multimedia collaboration session have equal privilege levels”

As disclosed in Roseman, the Requester is the person who has requested and established a conference. *See* Roseman column 3, lines 22-23. The Requester is given special privileges by the system to control, among other things, who is invited, and how the conference is conducted. *See id.* column 3, lines 29-62. It is the Requester who has the power to conduct the meeting in a manner allowing all participants to communicate simultaneously. *See id.* column 12, lines 29-31. . Accordingly, the Requester is a participant of the conference but also the controller of the conference. The presence of a Requester, who has the power to control how the conference is conducted and how the participants participate, as disclosed in Roseman, is directly counter to the claimed collaboration system wherein all participants have equal privilege levels.

Counter to the assertions of the Examiner, Roseman explicitly discloses the Requester as having additional privileges during a collaboration session specifically; the Requester can override time limits given to those who speak. *See id.* column 12, lines 35-38. Thus clearly

indicating that all participants do not have equal privilege levels as the participants can only act in accordance with the Requester.

In fact, the Examiner's reliance on Col. 11:38-48 appears to be misplaced. Here Roseman discusses using "Robert's Rules of Order" as a method of controlling the participation levels and privileges of each participant. Again, such a distinguished hierarchy, at least between the Requester and the participants, let alone between the participant's themselves, is directly opposite to the claimed language which requires all participants to have equal privilege levels. As such, Roseman does not disclose the claimed multimedia collaboration system configured so that all participants in a multimedia collaboration session have equal privilege levels, as recited in independent claim 1.

Since claims 3-12 depend from claim 1, and since Roseman does not disclose all of the limitations of claim 1, Applicants submit that claims 3-12 are patentable at least by virtue of their dependency from claim 1. Accordingly, Applicants respectfully request that the rejections of claims 1 and 3-12 under 35 U.S.C. § 102(e) be reconsidered and withdrawn.

Independent Claim 13

Applicants submit that Roseman fails to disclose at least the following claim limitations recited in independent claim 13:

"a client device comprising: a current presentation section;
a control section including an opened presentation feature"

The Examiner appears to argue that Figure 10 of Roseman discloses the claimed current presentation section, as disclosed in claim 13. *See* Office Action page 3. Applicants respectfully disagree. Figure 10 depicts the user interface of the conference room shrunk to a size smaller than the user's screen and workspace, and an icon in the user's workspace representing a document with the title "document to be placed on the table." *See* Roseman FIG. 10; column 8, lines 4-11. Roseman further illustrates the user dragging the file from his workspace, commonly known as a desktop, into the conference room, thereby permitting the file to be interacted with by participants of the conference. *See id.* Roseman discloses the procedure of dragging a document from a workspace to the conference to illustrate how a document can be shared in the conference. Roseman is clear that a document cannot be shared, and thus can not be a part of any presentation, until it is on the conference table, and explicitly states that a paper removed from

the conference cannot be accessed by the conference participants. *See, e.g., id.* column 11, lines 18-19; column 11, lines 36-37. It follows that the document disclosed in Figure 10, which is not only not on the conference table, but is not even in the conference room, cannot be considered a part of a presentation. Accordingly, Figure 10 cannot disclose the claimed user interface comprising: a current presentation section.

Furthermore, Roseman fails to disclose the claimed current presentation section. First, Roseman does not disclose a current presentation, making it impossible for Roseman to disclose a current presentation section. Roseman does not disclose if or how objects are determined to be current or noncurrent. *See id.* column 11, lines 18-37. Without a way to distinguish between current and noncurrent documents, Roseman cannot disclose a current presentation. In Roseman, conference participants have no control over which documents to view; every document is displayed indiscriminately. *See, e.g., id.* FIGs. 9-14; column 11, lines 18-37. To the contrary, a current presentation, as disclosed, is not merely a presentation which is available to all participants to view, it is a presentation each individual user has independently chosen to view. *See* present application, paragraph 46. Roseman does disclose users being capable of completely removing documents from the conference table, thereby preventing the documents from being viewed. *See* Roseman column 11, lines 36-37. However, removing a document from the conference table prevents all users from viewing it, and is quite distinct from the ability of each user to independently choose which document to view without affecting the views and options of other users, as disclosed in the present invention. *See id.*; present application, paragraph 46. Thus, because Roseman fails to disclose a current presentation, it cannot disclose the claimed current presentation section.

Second, even assuming, *arguendo*, that Roseman discloses a current presentation, Roseman fails to disclose the claimed current presentation section. The conference table, where all documents which are to be viewed must be located, cannot be considered a current presentation section. *See* Roseman column 11, lines 18-19. A review of Roseman Figures 9-14 reveals that all objects are handled identically and displayed simultaneously on the conference table. *See, e.g., id.* column 11, lines 18-32; FIGs. 9-14. It is clear that a current presentation section, as disclosed in the present application, is not a section which indiscriminately displays each and every document that is a part of a conference. Rather, the current presentation section displays a presentation selected by a user of the client device, and can vary by user. *See, e.g.,*

present application, paragraph 46; paragraph 64; FIGs 3-7. Because the conference table is the only section in which documents are displayed, and the conference table cannot be considered a current presentation section, Roseman does not disclose the claimed current presentation section.

The Examiner does not specify any disclosure within Roseman with respect to a control section including an opened presentation feature. Applicants submit that Roseman fails to disclose a control section. Roseman discloses the following attributes of the conference room interface: an area of the screen in which the pictures of participants of the conference are shown, *See, e.g.*, Roseman column 7, line 35; FIG. 9; a conference table in which documents and notes can be placed or interacted with, *See, e.g.*, *id.* column 7, lines 55-56; FIG. 9; pointers, which are used by the participants to interact with documents and the conference room interface, *See, e.g.*, *id.* column 7, lines 61-67; FIG. 9; and a "notes" area, where notes the participants can write on are generally located, *See, e.g.*, *id.* column 8, lines 18-21; FIG. 9. Absent anywhere from the disclosure in Roseman is a section of the user interface which contains distinct control features—features which control how the user interface functions, as disclosed and claimed in the present application. *See, e.g.*, present application, paragraph 71; FIG. 3. As disclosed in Roseman, all interaction and control of features is controlled by each user's pointer. *See* Roseman column 7, lines 61-67; column 11, lines 33-37. The pointer is not a section which is a part of the user interface; it is an object which exists within and interacts with the user interface. Unlike the pointer disclosed in Roseman, the control section as disclosed in the present application is itself a part of the user interface, and is not merely an object that interacts with the interface. *See, e.g.*, present application, paragraph 71; FIG. 3. Because Roseman fails to disclose a control section, it cannot disclose the claimed control section including an opened presentation feature.

Even assuming, *arguendo*, that a pointer is a control section, Roseman still fails to disclose the claimed client device comprising a control section including an opened presentation feature. The pointers disclosed in Roseman do not have features themselves; they interact and control the features of other items, such as the features of a note pad. *See, e.g.*, Roseman FIG. 20B; column 11, lines 33-37. Thus, Roseman fails to disclose the claimed control section including an opened presentation feature.

Also, Roseman does not disclose a control section comprising an opened presentation feature which is a part of a client device, as claimed. As disclosed in Roseman, when a participant wants to independently open and control a document, he must 1) drag the document

from the conference table to his workstation screen, and 2) activate the document, which means utilizing the operating system to open the document using the default application for the specific document. See id. FIG. 16C. Thus, the opened presentation feature, as disclosed in Roseman, is not a part of the control section, and indeed, is not a part of the client device. Accordingly, Roseman fails to disclose the claimed client device comprising a control section including an opened presentation feature.

Since Roseman does not disclose a current presentation, a current presentation section, a control section, or a client device comprising: a control section including an opened presentation feature, Roseman fails to disclose the claimed client device comprising a current presentation section and a control section as recited in independent claim 13. Since claims 14-40 depend from claim 13, and since Roseman does not disclose all of the limitations of claim 13, Applicants submit that claims 14-40 are patentable at least by virtue of their dependency from claim 13. Accordingly, Applicants respectfully request that the rejections of claims 13-40 under 35 U.S.C. § 102(e) be reconsidered and withdrawn.

Independent Claim 41

The Examiner asserts that Roseman discloses a multimedia collaboration system configured so that presentation control of the session is exchanged freely between participants. While Applicants respectfully disagree with this assertion, Applicants have amended claim 41 to more particularly describe the subject matter sought to be protected. Applicants submit that Roseman fails to disclose the following claim limitation recited in independent claim 41:

“client devices having equal privilege levels”

As discussed above, and fully incorporated herein, Roseman explicitly discloses the Requester having additional privileges at all times, even during a collaboration wherein ideas are freely exchanged among participants. See, e.g., Roseman column 12, lines 35-38. Accordingly, Roseman does not disclose the claimed client devices having equal privilege levels as recited in independent claim 41. Applicants respectfully request that the rejection of claim 41 under 35 U.S.C. § 102(e) be reconsidered and withdrawn.

Independent Claim 42

Applicants submit that Roseman fails to disclose the following claim limitations recited in independent claim 42:

“wherein the method comprises: assigning control of the central presentation region to the client device that most recently presents information to the central presentation region.”

The Examiner does not specify any disclosure within Roseman with respect to claim 42. The Examiner appears to argue a method of freely exchanging ideas among participants, and a method where procedural rules are used to regulate communication and maintain order, disclose the claimed method comprising: assigning control of the central presentation region to the client device that most recently presents information to the central presentation region. Applicants respectfully disagree. First and foremost, Roseman has absolutely no disclosure regarding limiting control of the conference table, i.e. limiting who can add documents to the table. Roseman merely discloses controlling speaking privileges. See Roseman column 11, lines 18-50. Secondly, even assuming, *arguendo*, that controlling speaking privileges is equivalent to controlling the central presentation region, Roseman fails to disclose a method of distributing control as claimed in the present invention- by assigning control of the central presentation region to the client device that most recently presented. Roseman discloses only two mutually exclusive methods for governing the conduct of a meeting. See *id.* column 3, lines 52-56. The first method gives absolute power to the Requester to control who can communicate. See *id.* column 3, lines 53-54. While the Requester theoretically could implement the claimed method, there is absolutely no disclosure regarding forcing the transfer of conference control to a specific person, such as the person who most recently put a document on the conference table. See *id.* column 11, lines 38-46. The second method creates a “brainstorming free-for-all.” See *id.* column 3, lines 55. This method fails to disclose the claimed method where control is assigned to a specific person, as there is no disclosure of the host, Requester, or the participants being capable of specifying who will be the next person to speak. See *id.* column 12, lines 34-42. During a free-for-all, Roseman merely discloses silencing the participant currently speaking. See *id.* column 12, lines 42-45. There certainly is no disclosure in Roseman of forcing the transfer of control of the conference table to the person who most recently added a document to the table, or spoke. Finally, the concept of assigning control of the free-for-all to a specific person is counter intuitive, as the purpose of the

free-for-all is to not put limits on when and how someone can interact with other participants. *See, e.g., id.* column 12, lines 29-31.

Because Roseman has absolutely no disclosure regarding assigning control of the conference table, or assigning control to the person who most recently added a document to the conference table, Roseman fails to disclose the claimed method comprising: assigning control of the central presentation region to the client device that most recently presents information to the central presentation region as recited in claim 42. Accordingly, Applicants respectfully request that the rejection of claim 42 under 35 U.S.C. § 102(e) be reconsidered and withdrawn.

2. Claims 33-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Roseman, U.S. Patent No. 6,608,636 ("Roseman"). Applicants respectfully traverse each of these rejections for the following reason. Since claims 33-39 depend upon claim 13, and since Roseman, as discussed above, does not disclose all the limitations of claim 13, Applicants submit that claims 33-39 are patentable at least by virtue of their dependency from claim 13. Therefore, Applicants respectfully request that the rejection of claim 13 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

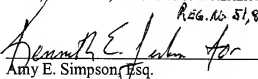
CONCLUSION

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

In the event that a variance exists between the amount tendered and that required by the U.S. Patent and Trademark Office to enter and consider this Reply, or to prevent abandonment of the present application, please charge or credit such variance to the undersigned's Deposit Account No. 50-2613 (Order No. 45098.00011.UTL1.P1068).

Respectfully submitted,

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